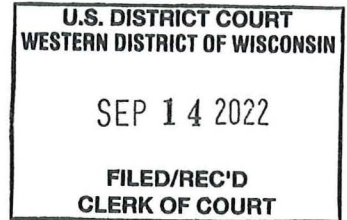


IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA

SEALED INDICTMENT

v.

Case No. **22 CR 106 JDP**

RAJIIV DAVID ISREE,

18 U.S.C. § 2251(a)

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2253

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

On or about June 17, 2022, in the Western District of Wisconsin, the defendant,

RAJIIV DAVID ISREE,

knowingly and intentionally used a minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, ISREE used an Apple iPhone 11 to produce a visual depiction, an image with a file name ending in 0881, of Minor A engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT 2

On or about June 12, 2022, in the Western District of Wisconsin, the defendant,

RAJIIV DAVID ISREE,

knowingly and intentionally used a minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using

materials that had previously been transported in interstate and foreign commerce, specifically, ISREE used an Apple iPhone 11 to produce a visual depiction, a video with a file name ending in 0863, of Minor A engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT 3

On or about June 12, 2022, in the Western District of Wisconsin, the defendant,

RAJIIV DAVID ISREE,

knowingly and intentionally used a minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, ISREE used an Apple iPhone 11 to produce a visual depiction, a video with a file name ending in 0864, of Minor A engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT 4

On or about June 12, 2022, in the Western District of Wisconsin, the defendant,

RAJIIV DAVID ISREE,

knowingly distributed a visual depiction using any means or facility of interstate and foreign commerce, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and the depiction was of such conduct. Specifically, ISREE used SnapChat to send a file ending in 0056, a video of Minor A engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2252(a)(2)).

FORFEITURE ALLEGATION

As a result of the offenses charged in Counts 1-4 of this indictment, and upon conviction for violating Title 18, United States Code, Sections 2251(a) and 2252(a)(2), pursuant to Title 18, United States Code, Section 2253, the defendant,

RAJIIV DAVID ISREE,

shall forfeit to the United States his right, title, and interest in:

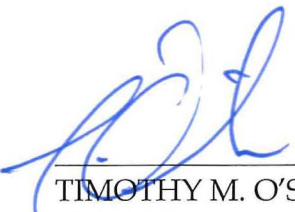
- (1) Any and all visual depictions which contain images which are or appear to be child pornography, together with the storage media in which they are contained, and
- (2) any and all property used or intended to be used to commit or to promote the commission of the aforementioned offense, including property specifically described as an Apple iPhone 11.

A TRUE BILL



PRESIDING JUROR

Indictment returned: 9-14-2022



TIMOTHY M. O'SHEA
United States Attorney